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309 KEARNS BUILDING
SALT LAKE CITY, UTAH 84101

VIA FAX TRANSMITTAL & CERTIFIED MAIL - RETURN RECEIPT

August 12, 1992

**Mr. Mike Zimmerman, Environmental Protection Specialist
U. S. Environmental Protection Agency
Region VIII, (8HWM-ER)
999 18th Street, Suite 500
Denver, Colorado 80202-2405**

Dear Mr. Zimmerman:

Enclosed is a copy of a letter from our consulting Geochemist/Hydrologist which expresses his concerns regarding the "Report of Drilling Activities, Richardson Flat Tailings Site, Summit County, Utah" prepared for EPA by Ecology and Environment, Inc.

Because United Park City Mines Company shares Mr. Tuesday's concerns, I forward his letter to you in the hope that it will be of assistance to EPA in evaluating the monitoring wells which were installed in the landfill.

If we may be of future assistance in this matter, please advise.

Yours truly,

A handwritten signature in dark ink, appearing to read "Edwin L. Osika, Jr.", written over a horizontal line.

**Edwin L. Osika, Jr.
Executive Vice President**

ELO/Jr./rfmwr



P.O. BOX 3445, BUTTE, MONTANA 59702 PHONE (406) 494-4024 FAX (406) 494-2521

August 11, 1992

Mr. Ed Osika
United Park City Mines
309 Kearns Building
Salt Lake City, Utah 84125

Dear Ed:

I have reviewed the report entitled "Report of Drilling Activities, Richardson Flats Tailings Site, Summit County, Utah" prepared for EPA by their TAT contractor, Ecology and Environment, Inc. EPA did not sample the landfill wells, but measured water levels in the wells, since they are evaluating UPCM's concerns about the wells' construction.

I am concerned that in reviewing the information regarding the installation of the landfill wells, the incomplete and incorrect information included in the TAT report will lead to erroneous conclusions. First, the concerns I initially raised, about compromising the integrity of the clay layer underlying the landfill, are absent from the report. Secondly, the photograph in Appendix B labeled "PH-19" is not from the 20-22 foot depth of MW-2 as indicated, but is from the 25-27 foot depth and clearly shows the clay material at approximately 26.5 feet below ground surface at MW-2. This split-spoon sample is critical in determining the exact boundary between the landfill materials and the underlying clay layer. Thirdly, the drilling log in Appendix C does not accurately portray the location of the red-brown clay at MW-2. While the description is accurate (wood plastic and paper and a thin, grey-black, silty clay [landfill] grading to a red-brown clay [confining layer]), there is no indication of where the contact between the landfill debris and the red-brown clay is located. As shown in photo PH-19, the red-brown clay was intercepted at approximately 26.5 feet below ground surface in MW-2. Fourth, EPA's decision not to sample these wells and to postpone a decision on what to do with them only exacerbates the problem (i.e. the landfill continues to flood). Finally, I hope that Mr. Troy Sanders, the report's author, does not bear the brunt of the responsibility for this problem as he was not the TAT representative making critical decisions that led to these problems.

I hope that the above discussion can be helpful in EPA's evaluation of the drilling data. If you have some additional concerns or there are parts of the discussion that are unclear, do not hesitate to call.

Sincerely,

Bill [Signature] for David S. Tuesday

David S. Tuesday
Principal Geochemist/Hydrogeologist

